2:22-cv-01279-BHH Date Filed 04/20/22 Entry Number 1-1 Page 1 of 7



Service of Process Transmittal

03/21/2022

CT Log Number 541257943

TO: KIM LUNDY- EMAIL

Walmart Inc.

GLOBAL GOVERNANCE/CENTRAL INTAKE, 2914 SE I STREET MS#0200

BENTONVILLE, AR 72712-3148

RE: **Process Served in South Carolina**

Wal-Mart Stores, Inc. (Former Name) (Domestic State: DE) FOR:

WALMART INC. (True Name)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: GREEN SHARONDA // To: WALMART INC. **DOCUMENT(S) SERVED:** Letter, Summons, Complaint, Attachment(s),

COURT/AGENCY: Dorchester County Court of Common Pleas, SC

Case # 2022CP1800443

Personal Injury - Slip/Trip and Fall - 08/21/2019, 9880 Dorchester Road, Summerville, SC NATURE OF ACTION:

ON WHOM PROCESS WAS SERVED: CT Corporation System, Columbia, SC

DATE AND HOUR OF SERVICE: By Certified Mail on 03/21/2022 postmarked on 03/18/2022

JURISDICTION SERVED: South Carolina

APPEARANCE OR ANSWER DUE: Within 30 days after service, exclusive of the day of service

ATTORNEY(S) / SENDER(S): Ravi C. Sanyal

SANYAL LAW FIRM, LLC 778 St. Andrews Blvd. Charleston, SC 29407

843-641-0347

ACTION ITEMS: CT has retained the current log, Retain Date: 03/21/2022, Expected Purge Date:

03/31/2022

Image SOP

C T Corporation System 2 Office Park Court **REGISTERED AGENT ADDRESS:**

Suite 103

Columbia, SC 29223

877-564-7529

MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

Page 2 of 7 SANYAL LAW FIRM 718 St. ANDREWS BLVD CHARLESTON, SC 29407 7021 2720 0000 7856 0164 2 OFFICE PARK COURT SUITE 103 COLUMBIA, SC 29223









March 11, 2022

VIA CERTIFIED MAIL, RETURN RECEIPT

C T Corporation System 2 Office Park Court, Suite 103 Columbia, S.C. 29223

Re:

Sharanda Green v. Wal-Mart Stores, INC

C/A Number: 2022-CP-18-00443

Dear Sir/Madam:

Enclosed please find for service upon you a filed, clocked-in copy of the Summons and Complaint regarding the above-referenced matter.

With kind regards,

Ravi Sanyal

RCS/pdh

Enclosure

ELECTRONICALLY FILED - 2022 Mar 10 4:30 PM - DORCHESTER - COMMON PLEAS - CASE#2022CP1800443

STATE OF SOUTH CAROLINA
COUNTY OF DORCHESTER

PLAINTIFF,

٧.

WAL-MART STORES, INC,

SHARONDA GREEN,

DEFENDANT.

THE COURT OF COMMON PLEAS CASE NUMBER 2020-CP-018-

SUMMONS (JURY TRIAL REQUESTED)

TO THE DEFENDANTS ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is hereby served on you, and to serve a copy of your Answer to the said Complaint upon the subscribers at 778 St. Andrews Boulevard, Charleston, SC 29407, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in such Complaint.

SANYAL LAW FIRM, LLC

By:

s/Ravi C. Sanyal

Ravi C. Sanyal, Esquire Sanyal Law Firm, LLC 778 St. Andrews Blvd. Charleston, SC 29407

Phone: 843-641-0347 Fax: 843-641-0362

Email: ravi@sanyallaw.com Attorney for Plaintiff

Charleston, South Carolina This 10th day of March, 2022

STATE OF SOUTH CAROLINA	THE COURT OF COMMON PLEAS CASE NUMBER 2022-CP-18-
COUNTY OF DORCHESTER	
SHARONDA GREEN,	COMPLAINT
PLAINTIFF, v.	(JURY TRIAL REQUESTED)
WAL-MART STORES, INC.,	•
DEFENDANT.	

The Plaintiff, complaining of the above-named Defendant alleges and would respectfully show unto this Honorable Court:

- 1. The Plaintiff Sharonda Green is a citizen and resident of the County of Dorchester, State of South Carolina.
- 2. That, upon information and belief, the Defendant Wal-Mart Stores, Inc. is a retail business organized under the laws of the South Carolina and conducting business under the laws of South Carolina and holding property located in Dorchester County.
- 3. Upon information and belief, Defendant Wal-Mart Stores, Inc. fund, control, manage, assume responsibility for the store operations, and/or own the land located at 9880 Dorchester Road, Summerville, South Carolina.
- 4. The events hereinafter described occurred in Dorchester County, South Carolina.
- 5. That this Honorable Court has subject matter and personal jurisdiction over the parties and venue is proper in this Court.

(NEGLIGENCE)

- 6. That on August 21, 2019, the Plaintiff was shopping at Wal-Mart Stores, Inc.'s Dorchester Road location, while carrying a glass jar in the store, the Plaintiff fell after slipping on a wet, slippery substance on the floor.
- 7. The Plaintiff fell, breaking the glass jar in her hand, sustaining bloody lacerations on said hand while landing on her lower back.
- 8. No signage nearby warned the Plaintiff of the wet, slippery substance on the floor.

- 9. That the Defendant, by and through its agents or employees, is guilty of one or more of the following acts of negligence, gross negligence, carelessness, recklessness, willfulness and wantonness, which proximately caused the incident and Plaintiffs resulting injuries:
 - (a) In failing to keep the floor in a reasonably safe condition free from any hazards;
 - (b) In failing to correct the dangerous condition while Defendant was under actual and constructive notice of said condition;
 - (c) In creating and providing a hazardous and dangerous condition on the grounds in general and to the plaintiff in particular;
 - (d) In failing to give warnings to Plaintiff of the dangerous condition and potential dangers which existed at the time of the Plaintiff's fall;
 - (e) In failing to properly inspect and maintain the area where Plaintiff fell so as to discover and correct the dangerous condition;
 - (f) In failing to properly train, instruct and supervise its employees in the proper and safe inspection and maintenance of the area where Plaintiff fell;
 - (g) In creating an unsafe condition in the retail area whereupon business invitees regularly walk;
 - (h) In failing to follow its own policies and procedures for inspecting and maintaining the walkway:
 - (i) In failing to adequately assess the potential for an accident or injury and in failing to take action to avoid such outcome in the event such possibility was determined; and
 - (j) In generally failing to exercise the degree of care and caution that an ordinary, reasonably prudent person would have exercised under the same or similar circumstances then and there existing
- 10. Which negligence, gross negligence, carelessness, recklessness, willfulness and wantonness of the Defendant directly and proximately caused the injuries and losses of the Plaintiff as is hereafter set forth.

DAMAGES

- 11. The Plaintiff hereby repeats and realleges the allegations contained in each and every paragraph above as if repeated verbatim herein.
- 12. That, as the direct and proximate result of the aforesaid negligent, grossly negligent, careless, reckless, willful and wanton acts and/or omissions of the Defendants, the Plaintiff:
 - (a) Fell landing on her lower back;
 - (b) Sustained several bloody lacerations to her hand as a result of the broken jar;
 - (c) Was subjected to painful removal of glass from her injured hand;
 - (d) Sustained a sprain to her right ankle and left knee;
 - (e) Suffered extreme and painful injuries;
 - (f) Has incurred substantial medical and doctor bills due to her injuries; and
 - (g) Was subjected to extreme pain, emotional distress, suffering and discomfort.
- 13. All to her damages, both actual and punitive, in an amount to be determined by the trier of facts

WHEREFORE, the Plaintiff prays for judgment against the Defendant in an amount of actual and punitive damages, if so awarded by a jury, that will fully, fairly and justly compensate her for the injuries sustained and for such other and further relief as may be deemed appropriate by the jury.

SANYAL LAW FIRM, LLC

By: s/ Ravi Sanyal

Ravi C. Sanyal, Esquire Sanyal Law Firm, LLC 778 St. Andrews Blvd Charleston, SC 29407 Phone: 843-641-0347

Fax: 843-641-0362

Email: ravi@sanyallaw.com
Attorneys for Plaintiff

Charleston, South Carolina This 10th day of March, 2022